

# State Enhanced 9-1-1

Advisory Committee

Meeting Minutes

March 16, 2006

- **Members Present:**

Chair. Chris Fischer, *Association of Public-Safety Communications Officials*

Dan Aycock, *Member at Large*

Rebecca Beaton, *Washington Utilities & Transportation Commission*

Dave Carlberg, *Washington State Association of Fire Chiefs*

Joseph Coultman, *Washington State Council of Firefighters*

Marlys Davis, *King County*

Dick Dickinson, *Cingular, Verizon, US Cellular*

Stephanie Fritts, *Rural Counties - West*

John Kaino, *Assoc. of WA Counties - West*

Marty Knorr, *Washington State Patrol*

Steve Lich, *Washington Fire Commissioners Association*

Chris Mace, *WA Assoc. of Sheriffs and Police Chiefs*

Jeanne Massingham, *Washington State Emergency Management Association*

Lynn Mell, *T-Mobile USA - Wireless*

Lorlee Mizell, *Urban Counties, East (Spokane County)*

Greg Partch, *Association of Washington Counties, East*

Jim Quackenbush, *National Emergency Number Association*

Markus Volke, *Qwest*

Deb Welsh, *Urban Counties - West*

- **Alternate Members Present:**

Mark Freitas, *Washington Fire Commissioners Association*

- **Guests Present:**

Jerry Foree (Qwest) and Deanna Wells (Cowlitz County)

- **County Coordinators Present:**

Wendy Perry (Chelan), Cindy Barnd (Cowlitz), Jerry Corder (Douglas), Rose Parr (Ferry), Virginia Boyd (Garfield), Mary Allen (Grant), Peggy Fouts (Grays Harbor), Tom Shaughnessy (Island), Donna Hamlin (Jefferson), Marlys Davis (King), Shirley Chapple (Klickitat), Michael Strozyk (Lewis), Dee Ann Edwards (Lincoln), Dave Rodriguez (Okanogan), Stephanie Fritts (Pacific), JoAnn Boggs (Pend Orielle), Jim Ricks (San Juan), Deb Welsh (Skagit), Dave Cox (Skamania), Jim Quackenbush (Thurston), Dan Bardsley (Wahkiakum), Dan Aycock (Walla Walla), Patty VonBargen (Whitman), and Wayne Wantland (Yakima).

- **State Office Staff Present**
  - Bob Oenning, William Boyd, Bruce Baardson, Lorri Gifford, Blessing Guillermo, and Kristin Ramos.
- **Welcome and Introductions**
  - Introductions were made throughout the room and Chris Fischer reminded attendees to please sign-in before leaving.
- **Review and Approval of the Minutes (16 February, 2006):**
  - Dan Aycock moved to accept as written the minutes of the 16 February 2006 meeting. Jim Quackenbush seconded the motion.
    - Discussion – Lynn Mell pointed out that on page 4, wireless carriers are going to seek comment from their tax departments.
    - Deb Welsh, not Deb Walsh.
  - The motion carried with slight edits.
- **Joseph Coultsman – Emergency Phones in Schools**
  - Tabled until next month.
- **Old Business – Bob Oenning**
  - Action Items
    - Status of all items in the works. [Summary of Action Items Sheet].
      - Review of some of the issues and discussions from the February 16, 2006 meeting were discussed as they occurred throughout the meeting.
      - Vonage has been more proactive than other companies.
    - Chris Fischer, on behalf of APCO, will look into reported comments.
- **Subcommittee Reports**
  - **Introduction of William Boyd and the Federal Commissions (FCC) Report**
    - William Boyd had nothing new to report.
  - **Wireless – Marlys Davis**
    - Phase I and Phase II Service Agreements [Excel Spreadsheet].
      - Combined AT&T/Cingular Service Agreement
        - Signed agreement has been received and will be emailed to counties. Cingular has been sent cost recovery exhibits and a response is still anticipated.
      - Sprint PCS and Nextel
        - Sent existing Agreements to Wendie Hood.
          - Wendie represents all counties.
          - Existing agreements have conflicting language.
      - US Cellular
        - No report
      - Inland Cellular
        - Has had signing Agreements due to issues in Idaho that may also apply in Washington.

- Phase I and Phase II Costs
  - Carrier Cost recovery
    - There will be a letter to the carriers next month to ask if cost recovery and documentation is desired, and if so, requesting documentation.
- Phase I and Phase II Implementation Issues/Order Status
  - Counties and carriers are encouraged to submit updates to Blessing Guillermo at [b.guillermo@emd.wa.gov](mailto:b.guillermo@emd.wa.gov) or fax 253.512.7202.
- Default Routing
  - The State Office is working on a Washington Administrative Code to designate which Washington State Patrol Public Safety Answering Points would be default PSAPs.
- Phase I Class of Service
  - Carriers are working on getting this cleaned up.
  - Cingular noted that Oregon P-ANIs were appearing and have been removed from the list.
- County Phase II Order Status
  - Airpeak using radio with no plans to go to Phase II.
- Phase II Implementation Issues
  - Counties and carriers are encouraged to submit updates to Blessing Guillermo at [b.guillermo@emd.wa.gov](mailto:b.guillermo@emd.wa.gov) or fax 253.512.7202.
  - ALI Datastream Upgrade to PSAPs [Phase II Status Sheet].
- Other Implementation Issues/Comments
  - William Boyd requested that the County Coordinators check the link and report any errors to him.
- Testing on Emergency Mode Lock Out
  - Testing by Whitman and Mason Counties
    - Whitman
      - Inland Cellular, Cingular, Verizon: All normal with no issues.
      - Sprint
        - Samsung phone: Screen displayed “Emergency Call Only”, press # to exit. Can accept incoming calls.
        - Sanyo phone: Screen displayed “Press menu for options”. Cannot make outgoing calls until menu is pressed.
  - PSAP call-backs are not getting back to source call.
    - There appears to be no direct path for a call from the PSAP to reach the phone.
    - Carriers should figure out how big an issue this is.
      - The need for a stronger signal is causing problems in emergency mode regarding caller location.
  - Carriers were asked to approach the FCC for a change in ruling, if appropriate.
    - Bob explained guidelines regarding roaming regulations and handset routines.
      - There is lacking uniformity with software, network, channels, and handset hardware.

- Suggested that FCC investigate strongest signal ruling.
  - Roaming status out of normal service area causes some phones to lock in emergency mode and/or lock onto another carrier's network (for stronger signal) in order to place a 911 call.
- Inappropriate Call Survey
  - Results discussion and explanation of low call levels.
- Public Education
  - Emergency lock-outs and roaming issues are difficult to explain to the public.
  - Discussion of Phase II News Release.
  - King County
    - Will conduct misdial tracking later this month.
      - May develop message promoting public awareness of how their phones work.
  - State Office press release will be the last issued until further notice.
    - Phase II is available statewide from at least 1 carrier.
  - Wireless misdials
    - Penelope Cassidy of the State E911 Office is working to provide statewide statistic to determine the actual size of the problem.
- Prepaid Wireless 911 Taxes
  - Carriers are waiting for report from tax departments.
  - Still waiting for Department of Revenue document.
- Wireless Call Statistics
  - Audit revealed that 10% of calls on wireline trunk groups are wireless calls. All are transfers from other wireless primary PSAPs.
- Other Issues
  - Cingular Exigent Circumstances request
    - PSAP had request for subscriber information denied and it would only be released to a commissioned officer
    - PSAP had identified themselves as the "Sheriff's Office" and not a PSAP. It is critical for call takers to identify that they are from a PSAP, as some carriers have different policies for releasing information to PSAPs vs. police departments.
- Olympics Discussion - 2010
  - International roaming will be an issue.
  - High impact on Washington Counties.
  - Possible issues between Washington and Canada regarding connectivity.
- Public Education
  - Emergency lock-outs and roaming issues are difficult to explain to the public.
  - Discussion of Phase II Press Release.
  - King County
    - Will do misdial tracking later this month.
      - May develop message promoting public awareness of how their phones work to address both the misdial and emergency mode problems.

- State Office press release will be the last issued until further notice.
      - Phase II is available statewide from at least 1 carrier.
    - Wireless misdials
      - Penelope is working to provide statewide statistic to determine the actual size of the problem.
  - VoIP Report
    - Federal Actions – William Boyd
      - Debriefing of lawsuit
        - Nuvio appealed to the Federal Communications Commission to rescind the order, but the Federal Communications Commission rejected the appeal and the Federal Communications Commission is not enforcing the deadline.
    - VoIP Service Agreement
      - VoIP language has been developed to add to the CLEC and Wireless Agreements.
      - Vonage was sent the Wireless and CLEC agreements as a starting point for working on a VoIP Agreement.
    - State VoIP E-911 Taxation Study
      - The legislature took no action to initiate a study on VoIP taxation.
      - The APCO-NENA Legislative Committee is working to develop legislation for next year.
        - Jim Quackenbush is the contact person.
    - Verizon has published guidelines for VoIP companies who desire to connect to Verizon.
    - Other VoIP Issues
      - APCO-NENA Committee
        - Should study issues and develop legislation. Jim Quackenbush is the contact person.
  - Comments/Questions
    - There are some questions concerning wireline necessity. No one is willing or able to give up wireline completely in favor of wireless only.
    - VoIP taxation is a 'next year' issue for the legislature.
- **Policy Review – Deb Welsh**
  - Proposed policies resulted in a four-hour long discussion at the March 9-10 Coordinator Forum in Vancouver, WA.
  - Acknowledgement and appreciation of committee members and State Office.
  - Committee Goals
    - Provide funding for the smaller counties within the guidelines of the WAC
    - Evaluate state wide services to benefit all counties
    - Review and make recommendations by March 16, 2006 for Advisory Committee review/action.
    - Make edits and minor changes
  - 2003 – 2005 Financial Overview by Bruce Baardson
    - \$8.5 million went out as Below-the-Line funding
    - There is \$6 million unappropriated, with no spending authority from the Washington State Office of Financial Management.

- Financial Projections within Appropriations 2005-07 – Bruce Baardson and Discussion
  - End with 10% of less remaining unspent.
  - Reduce BTL funding to fit.
  - Anticipate \$2 million carry over to 2007 for additional statewide services.
  - Anticipate \$1.7 million for BTL
    - No equipment replacement this year, but equipment should be replaced on a regular basis to prevent large equipment expenditures occurring simultaneously.
      - A schedule for equipment replacement is being developed.
      - Policy should be amended to reflect schedules for payment plans for equipment to be worked into the equation.
        - The counties need to have a say in what works best to address their specific needs.
          - Have counties look at their equipment and submit proposed replacement schedule to the State Office.
- Operations Contract Policy
  - Combined Wireless and Wireline Contract policies.
  - Used the new EMD policy format.
  - Removed references to the application process.
  - 1e: Based percentage split on received revenues rather than on number of received calls (50/50). 2b: Added new procedure to use local tax revenue prior to receiving state funds. 3b: Added reimbursement schedule of priorities.
  - Added to state wide services
    - Switching office enabling 900k
    - All Language Line costs 150k
    - Advisory Committee & Sub Committee attendance costs \$100k
    - Vulnerable analysis (Homeland Security) 0
    - National 911- related conferences for 911 Coordinator \$2,000 (\$78k)
    - Night Call Routing – 0
  - Removed travel costs from contract and these will be paid directly for Advisory Committee and Coordinator Forum.
  - Equipment purchases need state office approval prior to purchase.
  - Salary increase of three percent based on COLA.
  - Pub Ed materials available through the state and are not eligible items.
  - 7b Reimbursement docs will include warrant number and date.
  - 7c Reimbursement requests...30<sup>th</sup> day of the following month.
  - 7d Items processed in the order they are received.
  - 7e Delay/Reduction in reimbursement.
  - 8 Mid Year Review. Removed all language referring to BTL funding.
    - Training reports need to have acronyms spelled out.
  - Changes to Reimbursement Schedule
    - Removed language and expenses directly related to implementation and all items are now common elements.
    - S1 Now changed to Telephone System Maintenance.
    - S4 Coordinator salary increase three percent (\$53k)
    - S6 Added \$10,000 for Public Education Coordinator salary to assist the 911 Coordinator (\$310k).
      - Example: Staffing for Public Education booth at a fair, etc.

- No dispatch backfill associated with this money.
  - Catherine Bartholomew, formerly of the State E911 Office, used to provide reports regarding revenue.
    - Counties are not seeing these anymore because the spending allocation is more important for the biennium.
    - Is the counties 50/50 split balanced based upon monies received by the state office?
      - Projections are viewed and revenues are tracked. They are close to projections. Split is based upon last year's revenues.
      - Counties would like to have month-to-month or quarterly revenue information to track posting trends.
        - DOR is not addressed because there are no existing concerns.
- S7 Added \$10k for Training Coordinator to assist 911 Coordinator (\$310k).
- S8 Increased MSAG salary three percent (47k) based on COLA.
  - MSAG Coordinators are not required to attend some meetings and/or forums, but are welcomed as secondary personnel.
- S9 Added \$5k for MSAG Mapping training (155k).
- B1 Increased salary three percent (\$140) based on COLA.
- Dan Aycock moved to accept the Operations Contract Policy as submitted with recommendation for State Office review and implementation. Patty VonBargen seconded.
  - No discussion.
  - Motion Carried.
- Advisory Committee Meeting Attendance Policy
  - 1 All County Coordinators will be reimbursed for eligible travel expenses to all meetings.
    - Contract counties must still attend five meetings.
  - 2c Accountability changes for subcommittee work.
  - 4c Reimbursement for meals – must be in travel status during defined meal times.
  - Jon Kaino moved, Greg Partch, Discussion, Motion carried unanimously.
- Coordinator Forum
  - Three employees may attend the forum, one must be the coordinator.
  - 2b removed the MSAG requirement.
    - June is open to anyone, including a third person.
  - Contract County 911 Coordinator are required to attend all three forums.
  - Lorlee Mizell made the motion to approve the Advisory Committee Attendance Policy, Dan Aycock seconded.
    - No discussion.
    - Unanimously passed.
- Training Policy
  - 1b additional \$2k direct payment to all Coordinators for 911-related training or conferences under Statewide services.

- 1c Established 5k for MSAG/Mapping training to support relevant training for diverse needs. (\$155k)
  - State 911 may provide workshops for mapping/MSAG training as needed and requested.
- 2a Coordinator accountability for training.
- 2c Backfill only allowed for call taker training.
- 2c 3 Call taking guide cards – hard copy only.
- 3c Center backfill not allowed for Public Education and Training Coordinator monies.
  - Does the Advisory Committee want this to be returned to the Training Policy Committee?
    - Vendors tend to charge the maximum amount.
    - Some coordinators were not using funds appropriately, but needed guidance. There should be a general acceptable policy list. A guidance list should not be eliminated.
      - Instead of having this in the policy, add a link to the website for guidelines.
    - Jon Kaino moved to accept as presented the amended Training Policy to forward to State Office and implement July 1, 2006. Patty VonBargen seconded.
      - Discussion
        - Chris Fischer would vote no as is.
        - Patty VonBargen believes that the coordinators should have a say in what type of training is needed.
        - Dave Cox would like to see guidelines in place to serve as guidelines only and not ‘set in stone’.
    - The motion carried
      - Chris Fischer, Marlys Davis, and Jeanne Massingham indicated negative votes.
- Maintenance Policy
  - This discussion was recommended to be returned to the maintenance subcommittee.
- Call Detail Recorder Policy
  - Outline current practice
  - Include maintenance or time and materials not to exceed 10% of purchase price of contract year.
- Auxiliary Generator Policy
  - Outline current practice
  - Include maintenance or time and materials not to exceed 10% of purchase price of contract year.
- E911 Logging/Voice Recorder Support Policy
  - Outline current practice
  - Include maintenance or time and materials not to exceed 10% of purchase price of contract year.
- E911 Clock Synchronizer Support Policy
  - Outline current practice
  - Include maintenance or time and materials not to exceed 10% of purchase price of contract year.
- E911 Call Detail Recorder Support Policy



- Outline current practice
    - Include maintenance or time and materials not to exceed 10% of purchase price of contract year.
  - 911 Computer Aided Dispatch Support Policy
    - Outline current practice
    - Include maintenance or time and materials not to exceed 10% of purchase price of contract year.
  - UPS Policy
    - Outline current practice
    - Include maintenance or time and materials not to exceed 10% of purchase price of contract year.
  - E911 Telephone System Policy
    - Outline current practice
    - Include maintenance or time and materials not to exceed 10% of purchase price of contract year.
      - Motion to accept as written these presented policies, as written, for return to the State Office for review and implementation made by Marty Knorr and seconded by Dan Aycock.
        - No discussion.
        - The motion carried.
  - Below the Line Funding (BLT) Policy
    - 2a1 Priority 1 – remaining eligible but unfunded elements
      - Current county contracts
      - Unfunded county applications
    - 2a2 Priority 2 – Statewide projects and agreements even if for the next fiscal year or biennium.
    - Priority 3 – Cost Recovery/Additional County Assistance presented from hard copy policy.
      - Deobligating affects Below the Line funding.
    - Motion to accept as written the Below the Line funding Policy for return to the State Office for approval and implementation by Dan Aycock. Lorlee Mizell seconded. Effective date March 17, 2006 as written. No Discussion. The motion carried unanimously
  - Summary of Policies presented.
    - Reminder – State 911 office cannot put funds in a reserve account. Counties should put their BTL funds in reserve accounts to off set future equipment and upgrade costs.
  - State Patrol
    - Use statewide funding for State Patrol equipment to enhance operational status.
      - Politically, we cannot afford to let State Patrol fail regarding the phone system.
  - Deb Welsh wished to thank the committee, subcommittee, and the State Office.
- **Strategic Planning – Dan Aycock**
    - Met yesterday.
      - One piece needs to be readdressed with the State Office and will report next month.

- **211 – Wayne Wantland**

- On page three in the minutes, there was reference to 211 funding. Bob will address this under legislative.

- **State Office Staff Reports**

- **Financial Status – Lorri Gifford**

- FY06 Wireline and FY06 Wireless Fund Status Year to Date [Wireline Fund Status Document].
  - Presentation of information provided.
    - Revenue report will be provided next month.
    - On the frame relay and phone bills on the network side: Bob Oenning expressed thanks to Qwest.

- **Avian/Pandemic – Jim Ricks**

- Subcommittee members presented.
- The epidemic is spreading and we are overdue for a pandemic and under-protected, but we are moving with dispatch. Every community needs to have a plan.
  - The message is that we are on our own. We must be prepared.
  - What happens if everyone is sick and no aid is readily available?
    - State and local E911 will have a plan part of the greater plan of EMD State and Local.
    - It will go into effect as soon as adopted and voluntary for the first few phases.
    - It will have the weight of law as needed in the final phases.
    - We are in phase three of six in the Pandemic Alert.
      - It is now going from fowl to human.
      - Keep PSAPs healthy.
      - Begin recommendations for sanitation procedures at work stations.
    - Phase 4
      - Limit human to human spread, contain the virus, social distancing.
      - Continue existing practices, social distancing, essential PSAP only, and family support.
    - Phase 5
      - Large Clusters
      - Maximum efforts to contain or delay the spread.
        - Close restaurants, schools, stockpile final supplies.
        - Triage personnel will be used in lieu of traditional ambulances.
        - Emergency Operations Centers (EOCs) would be activated, but still desiring to limit their own exposure.
    - Phase 6
      - Widespread to general population, implement health and contingency plan, risk communication, plan for the next wave.
    - Planning outside the phase alert.
      - Take advantage of technological advantages for PSAP operations. Help starts with 911.
    - Questions-Comments

- There may be a state of emergency declared with EOCs activated.
- **National/Legislative – Bob Oenning**
  - S 1063 Adjutant General letter out.
  - Enhanced 911 Act – more people on board.
  - SHB 2543 passed and is expected to be signed by the governor. There may be bill signings on Saturday. The Advisory Committee has been extended to 2011. There was a legislative request to have a VoIP representative on the Advisory Committee.
    - 211 is funded 2.5 million dollars for the next year. E911 will be administering the 211 program.
      - We can see their policies upon request. We get nothing for managing the 211 contract.
- **New Business – Chair Chris Fischer**
  - Peggy Fouts reports that she is turning over the chairmanship of the Public Education Committee to Kellie Ottmar, Adams County 911 Coordinator.
    - Requested the State recognize Kellie Ottmar as the new chair of the Public Education Committee.
    - Stephanie Fritts reminded everyone to register for the APCO Summer conference in June in Wenatchee. Rooms are filling up. There is a great program put together. [www.apcowa.org](http://www.apcowa.org). Download registration information and conference materials.
    - Millie Tirapelle, former Grays Harbor County 911 Coordinator, will return to Washington State as 911 Coordinator at RiverCom. Her expected start date is June 1<sup>st</sup>.
- **Motion to adjourn:**
  - Dan Aycock made the motion to adjourn, Joe Coultman seconded. No discussion. The motion carried.

The next scheduled E911 Advisory Committee meeting is THURSDAY, April 20, 2006 at  
THE LAQUINTA INN & SUITES in Federal Way, Washington  
32124 – 25<sup>TH</sup> AVENUE S  
FEDERAL WAY, WA 98003  
(253) 529-4000

- **Action Items from March 16, 2006 meeting:**
  - Lorlee Mizell made the motion to approve the Advisory Committee Attendance Policy, Dan Aycock seconded.
    - No discussion.
    - Unanimously passed.
  - Dan Aycock moved to accept the Operations Contract Policy as submitted with recommendation for State Office review and implementation. Patty VonBargen seconded.
    - No discussion.
    - Motion Carried.
  - Jon Kaino moved to accept as presented the amended Training Policy to forward to State Office and implement July 1, 2006. Patty VonBargen seconded.

- Discussion
  - Chris Fischer would vote no as is.
  - Patty VonBargen believes that the coordinators should have a say in what type of training is needed.
  - Dave Cox would like to see guidelines in place to serve as guidelines only and not 'set in stone'.
  - The motion carried
    - Chris Fischer, Marlys Davis, and Jeanne Massingham indicated negative votes.
- Motion to accept as written these presented policies, (CAD, Call Detail Recorder, Auxiliary Generator, E911 Logging/Voice Recorder, Clock Synchronizer, Call Detail Recorder, CAD, UPS, and E911 Telephone System) as written, for return to the State Office for review and implementation made by Marty Knorr and seconded by Dan Aycock.
  - No discussion.
  - The motion carried.
- Motion to accept as written the Below the Line Policy for return to the State Office for approval and implementation by Dan Aycock. Lorlee Mizell seconded. Effective date March 17, 2006 as written.
  - No Discussion.
  - The motion carried unanimously
- The State Office was requested to file comments with the FCC asking carriers to educate subscribers on how their phones work in regard to emergency lock-out mode.
- Bob formulate a letter to the County Commissioners regarding AC recommendations for reserve of BTL funding.
- Kristin will email Deb Welsh's PowerPoint to the Advisory Committee.
- Kristin will email Jim Rick's Pandemic PowerPoint to the Advisory Committee.
- Discuss IT personnel for systems to manage viruses, etc. This will go into future policy.

Concerns with Senate Bill 1063  
Enhanced 911 Advisory Committee  
12 December 2005

The Enhanced 911 Advisory Committee was formed in 1991 as part of Referendum 42 to give advice and assistance to the Military Department's Enhanced 911 Program. That program is charged with assuring the availability of Enhanced 911, state-wide. At a recent meeting of that group they discussed Senate Bill 1063 and suggested that the following comments on that legislation be expressed to Congress.

Overall, this group noted general support for the legislation and applauded the interest in forwarding Enhanced 911 connectivity for users of Voice over Internet Connectivity. Having Congressional support on the integration of new technologies to assure effective 911 service is welcome.

Particular support was expressed for the provisions that uphold the concept of Voice over Internet Protocol being equivalent to traditional wireline service for customer access to 911 systems, for direction on assuring assessment of state and local 911 specific taxes, and for liability provisions that include those who answer 911 calls. Those elements set the stage for forwarding VoIP services with a clear intent that 911 customers will receive the expected service that they have become accustomed to, and in cases like Washington State, voted to support with subscriber paid taxes.

The group applauded the strong direction on the development of a plan for migration to an Internet Protocol enabled emergency network. The enhanced 911 networks of today have been patched to accommodate major changes in the telecommunications systems serving America. The time has come to replace them with technologies that look to the future. The fact that those advanced technologies can also bring great value to other programs such as information flow for homeland security purposes is a bonus. The language calling for aggressive plan development followed by assertive deployment sets the stage for emergency communications improvements from the 911 caller to the responding units.

There was concern over the special waiver provisions of the bill. Although these appear to be narrowly defined, the concern is that even this specificity could create unintentional consequences. The Federal Communications Commission already has clear authority to grant waivers. In recent decisions the Commission has been utilizing this authority in a selective manner where strong efforts by the regulated to achieve mandates have resulted in waivers specific to enhancing performance even further. Poor attempts have been acknowledged with appropriate failure to perform penalties. From the standpoint of those who receive 911 calls and want the highest performance from carriers to provide adequate caller location information, the rewarding of performance versus penalties is a superior tactic that might be precluded by this legislation. There is also a concern that the specificity of the waiver provisions in creating fixed targets will lead to an analysis by providers to work within the waiver process versus actually attempting early adoption of Enhanced 911 interconnect technologies.

The Washington State E911 community understands the logic behind and will comply with the letter of the provisions for a national listing of Public Safety Answering Points. However there are grave concerns over the posting of the listing of these agencies' phone numbers on a generally accessible web page. In spite of a rigorous public education effort, 911 continues to get calls from

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people who feel that their life-threatening situation is manageable, and who have often spent considerable time looking for a number besides 911 to call for assistance. That is why the administrative numbers for Public Safety Answering Points are generally not listed in phone books. 911 calls are received on networks where call management tools permit transfer, even to multiple parties if necessary. 911 calls are received by trained 911 professionals with 24x7 access from both the calling public and to tools to dispatch assistance. 10-digit administrative numbers may not be answered except during business hours. The primary concern is that if the numbers are posted on a web page they will be found and they will be used by persons when those persons should be dialing 911. Making a list of appropriate numbers for Public Safety Answering Points nationwide is a laudable goal, just assure that there is no requirement that the list be publicly available. This requirement should be an interim step toward a national network that permits transfer of a 911 call on that network between Public Safety Answering Points. The Public Safety Answering Point information, and that of selective router information, must be made available only in controlled distribution. Controlled distribution would also permit updates to be circulated with a greater assurance of receipt while also giving some protection from those who would use direct access for nefarious purposes.

Again, those who daily operate the 911 services in Washington State applaud the intent to assure that telecommunications customers who utilize Voice over Internet Protocol technologies will receive Enhanced 911 service equal to that of traditional landline technologies. The concerns with the language of S.1063 are that it mandates public availability of inappropriate 10-digit PSAP numbers and directs the Federal Communications Commission to grant waivers that may be counterproductive. Maintaining controlled number lists is permissible, and a more effective regulatory approach may be to reward companies who do their best to comply with Enhanced 911 rules. These changes would enhance the effectiveness of the bill.

Bob Oenning, Administrator

Washington State Enhanced 911 Program

253-512-7011

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**STATE OF WASHINGTON**  
**MILITARY DEPARTMENT**  
**EMERGENCY MANAGEMENT DIVISION**

*MS: TA-20 Building 20  
Camp Murray, Washington 98430-5122  
Phone: (253) 512-7000 • FAX: (253) 512-7200  
Website: <http://www.emd.wa.gov>*

February 14, 2006

«First\_Name» «Last\_Name»  
«Address\_1»  
«Address\_2»  
«City», «State\_» «Zip\_Code»

«GreetingLine»

A significant element to the success of the Washington State Military Department's Enhanced 911 Program is the involvement of the Public Safety Community as members of the Enhanced 911 Advisory Committee. This group was formed in 1991 by Referendum 42 to provide assistance to the Enhanced 911 Program to assure availability of Enhanced 911 state-wide.

The operators of the 911 services in Washington State desire to assure telecommunications customers they will receive Enhanced 911 service equal to that of traditional landline technologies. Overall, the Enhanced 911 Advisory Committee offered general support for the legislation and applauded the interest in forwarding Enhanced 911 connectivity for those who use Voice over Internet Protocol technology. As currently worded, S.1063 mandates public availability of 10 digit Public Safety Answering Point numbers and directs the Federal Communications Commission to grant waivers that may be counterproductive. Maintaining controlled number lists is permissible, but public availability of these numbers is inappropriate. A more effective regulatory approach than the proposed waivers may be to reward companies who comply with Enhanced 911 rules. These adjustments would enhance the bill effectiveness.

The Enhanced 911 Advisory Committee's concerns are detailed on the attached white paper. It is essential that our Enhanced 911 networks be upgraded to current technology standards in the near future.

If you wish more information on this issue please contact the Washington State Enhanced 911 Administrator, Bob Oenning at 253-512 7011 or via email at [b.oenning@emd.wa.gov](mailto:b.oenning@emd.wa.gov).

Sincerely,

Major General Timothy J. Lowenberg  
*The Adjutant General*  
Director, Washington Military Department

TJ:kcr

Attachment